UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 29 2014

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7004 2510 0001 9556 1882
RETURN RECEIPT REQUESTED

The Honorable Anthony Copeland, Mayor
City of East Chicago
4527 Indianapolis Boulevard
East Chicago, Indiana 46312

Subject: Information Request
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)
Docket No. V-W-14-308-19

Dear Mayor Copeland:

Protecting water quality is a high priority of the U.S. Environmental Protection Agency. Pollutants such as bacteria discharged to waterways from sewer overflows contribute to poor water quality and impairment of uses of those waterways. As authorized by the Clean Water Act (CWA), the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States.

The Indiana Department of Environmental Management (IDEM) issued NPDES Permit Number IN0022829 to the City of East Chicago. The permit authorizes discharges to waters of the United States in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit. The enclosed Information Request seeks information related to East Chicago's Pretreatment Program and information related to the operation and maintenance of the portion of the City of East Chicago's sewer collection system that collects and conveys sewage to the East Chicago Sanitary District Wastewater Treatment Plant, including information about sewer overflows that may have left the collection system prior to receiving required treatment. In addition, EPA is requiring that the City of East Chicago perform the combined sewer overflow and receiving stream sampling described in the attached document. Note that the obligation to perform the sampling will continue until October 31, 2014, unless EPA informs East Chicago that the sampling can cease at an earlier date.

EPA is authorized under Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to require reports and other information necessary to carry out the purpose of the CWA. Accordingly, pursuant to

Section 308(a) of the CWA, you are directed to provide EPA with the information requested in the enclosure.

In accordance with Section V, Paragraph 2 of the Information Request, you must include with your response a statement certifying that all information you submit is true and accurate to the best of your knowledge and belief using the certification language provided in that paragraph. Any questions that do not directly relate to your municipality's sanitary sewer system operations can be addressed with "not applicable" and a brief explanation.

Please exercise care to assure that responses are complete and accurate because Section 309(c)(2) of the CWA, 33 U.S.C. § 1319(c)(2), imposes criminal penalties where false information is knowingly provided to EPA.

You must submit a written response, with the information requested in the enclosure, within the timeframes specified to:

Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Michelle Heger, Environmental Engineer

Thank you for your cooperation in this matter. Should you have any questions, please contact Michelle Heger of my staff by telephone at (312) 886-4510 or by e-mail at heger.michelle@epa.gov.

Sincerely,

Tinka G. Hyde
Director, Water Division

Enclosure

cc: Mark Stanifer, Branch Chief, Office of Water Quality/Compliance Branch, IDEM, w/enclosure
Mary Hollingsworth, Branch Chief, Office of Water Quality/Surface Water, Operations & Enforcement, IDEM, w/enclosure
Natalie Maupin, Pretreatment Coordinator, Office of Water Quality/Compliance Branch, IDEM, w/enclosure
Mary Hoover, Section Chief, Office of Water Quality/Surface Water, Operations & Enforcement, IDEM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	Docket No. V-W-14-308-19
	)	
East Chicago Sanitary District	)	
	)	Proceeding under Section 308(a) of
NPDES Permit No. IN0022829	)	the Clean Water Act, as amended,
	)	33 U.S.C. § 1318(a)
	)	

INFORMATION REQUEST

I. STATUTORY AUTHORITY

1. The U.S. Environmental Protection Agency is issuing this Information Request to East Chicago Sanitary District (ECSD or you) pursuant to the authority vested in the Administrator of EPA by Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has re-delegated this authority to the Director of the Water Division, EPA Region 5.

2. Section 308(a) of the Act, 33 U.S.C. § 1318(a), provides, among other things, that whenever required to carry out the objective of this chapter, the Administrator of EPA shall require the owner or operator of any point source to: establish and maintain such records, make such reports, and provide such other information as she may reasonably require.

II. INSTRUCTIONS

1. You must complete each of the requests and submit the required and appropriate documentation specified in this Information Request according to the schedule(s) specified below.

2. Submission instructions are in Section V of this Information Request.

3. Within seven calendar days of your receipt of this Information Request, you must notify EPA, in writing, as to whether you intend to comply with this Request.

4. If you do not have documents responsive to a particular request, state in your written response that you do not have responsive documents.

5. You must keep all Records reviewed or generated in the course of responding to this Information Request until EPA informs you in writing that you are no longer required to keep the Records, or for five years, whichever is sooner.

III. DEFINITIONS

1. "2011 NPDES Permit" means National Pollutant Discharge Elimination System (NPDES) Permit No. IN0022829 that was issued to you by Indiana Department of Environmental Management (IDEM) on June 24, 2011 pursuant to Section 402(b) of the CWA, 33 U.S.C. § 1342(b), and IND. CODE § 13-13-5-1(1), and that became effective on July 1, 2011, and any modifications, revisions or amendments of such permit.

2. "Backup" shall mean any release of wastewater to public or private property that is caused by Blockages or other conditions in the Sanitary Sewer System. Such releases can include, but are not limited to, those that occur in basements.

3. "Blockage" shall mean the partial or complete interruption of flow as a result of some obstruction in any portion of the Sanitary Sewer System.

4. "Bypass," as defined by 40 C.F.R. § 122.41(m), shall mean the intentional diversion of waste streams from any portion of a treatment facility.

5. "Collection System" means the municipal wastewater collection and transmission system owned and operated by ECSD, including all pipes, interceptors, force mains, gravity sewer lines, lift stations, pumping stations, manholes and appurtenances thereto designed to collect and convey municipal sewage (including domestic, commercial, and industrial sewage) and storm water to the Wastewater Treatment Plant (WWTP) or to a Combined Sewer Overflow (CSO) Outfall. The "Collection System" includes both the Combined Sewer System (CSS) and Sanitary Sewer System.

6. "Combined Sewer Overflow Discharge" or "CSO Discharge" means any discharge of wastewater from the Combined Sewer System at any point prior to the headworks of the WWTP, including but not limited to discharge from any of the designated CSO Outfalls identified in Attachment A of the 2011 NPDES Permit.

7. "Combined Sewer Overflow Outfall" or "CSO Outfall" means any Outfall through which wastewater and/or storm water is discharged from the CSS into the receiving waters, including the Indiana Harbor Ship Canal and the Grand Calumet River, at any point prior to the headworks of the WWTP. CSO Outfalls include any Outfall identified in Attachment A to the 2011 NPDES Permit and any other point source through which ECSD is authorized to discharge wastewater and/or storm water from the CSS into the Receiving Waters.

8. "Combined Sewer System" or "CSS" means the portion of the ECSD's Collection System that is designed and constructed to collect and convey municipal sewage (including domestic,

commercial and industrial sewage) and storm water through a single-pipe system to the WWTP or to CSO Outfalls.

9. "Day" or "days" means a calendar day unless expressly stated to be a working day. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of business on the next working day.

10. "In-Stream" means within the Receiving Waters. Thus, In-Stream samples collected or measurements taken shall be samples and measurements of the Receiving Waters and not samples or measurements of any discharges from ECSD or any other point source into the Receiving Waters.

11. "Monitoring Period" means the time during which Water Quality Monitoring is to occur, which is to be the time period beginning on the date of EPA's approval of the Quality Assurance Project Plan up to and including October 31, 2014.

12. "Receiving Waters" means the Indiana Harbor Ship Canal and Grand Calumet River, and any of their tributaries.

13. "Record" means any recording of information in tangible or intangible form. It includes, but is not limited to: documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer printouts, and computer databases.

14. "Sanitary Sewer Overflow" or "SSO" shall mean an overflow, spill, diversion, or release of wastewater from or caused by your Sanitary Sewer System(s). This term shall include: (i) discharges to waters of the United States from the Sanitary Sewer System(s); and (ii) any release of wastewater from the Sanitary Sewer System(s) to public or private property that does not reach waters of the United States, including Backups.

15. "Sanitary Sewer System" shall mean all portions of your sewer system (including all pipes, Force Mains, Gravity Sewer segments, overflow structures, regulators, Pump Stations, manholes, and components thereof), designed and constructed to collect and convey only sewage, and not stormwater, from residences, commercial buildings, industrial plants, and institutions for treatment at East Chicago Sanitary District WWTP.

16. "Unauthorized Combined Sewer Overflow" means an overflow, spill, diversion, or release of wastewater from or caused by your CSS. This term will include: (i) an unpermitted discharge from the Respondent's CSS to waters of the United States; and (ii) any release of wastewater from the Respondent's CSS to public or private property that does not reach waters of the United States, including Backups. This does not include wet weather discharges from ECSD's permitted CSO Outfalls.

17. "Water Quality Monitoring" means the characterization of the concentration of *E. coli*, metals, dissolved oxygen (DO), temperature, and conductivity of the Receiving Waters. Water Quality Monitoring shall include, but not be limited to: the preparation of equipment

and sample containers, the collection of In-Stream samples of the Receiving Waters, carrying out field and laboratory measurements, the preservation and preparation of samples, and the review, validation, and reporting of the data collected.

18. "WWTP" means the wastewater treatment plant owned and operated by the East Chicago Sanitary District, 2011 NPDES Permit Number IN0022829, and located at 5201 Indianapolis Boulevard, East Chicago, Indiana, 46312.

19. "You" for purposes of this Information Request refers to East Chicago Sanitary District (ECSD) and to any agents, employees, contractors, or other entities that perform work or act in any way on behalf of, or at the direction of, ECSD.

IV. REQUESTS

General Information

Within 30 Days of receipt of this request unless otherwise indicated, ECSD shall:

1. Provide an up-to-date WWTP map. Clearly identify all property lines, buildings, structures, and areas.

2. Provide an up-to-date block process flow diagram of the WWTP. Clearly indicate the names of all process equipment and/or areas.

3. Provide a detailed narrative description of the WWTP operations, including any ability to bypass or divert any portion of the waste stream from or to any portion of the treatment plant.

4. Provide a comprehensive list of all equipment located at the WWTP. For each item, identify as of the date of receipt of this request:
    a. Whether the equipment is in service or out of service; and
    b. The equipment capacity (maximum and average).

5. Provide the latest version of the WWTP's Combined Sewer Overflow Operational Plan. Clearly indicate the dates of its original creation and of its latest update.

6. Provide a map of the sewer system and WWTP that identifies the latitude and longitude of stream monitoring locations.

7. Describe in detail the process and equipment (if applicable) ECSD uses to identify the start and end times of both wet weather overflow events and dry weather overflow events at each CSO Outfall.

8. Provide all documents and records, including information, analyses, calculations, supporting material, correspondence, and construction permits and applications that reference, detail, or describe maintenance, repair, or construction of CSO 005.

9. Complete the attached CSO Checklist (Attachment A to this document).

10. Provide a map of the Collection System that clearly indicates which portions of the system are designated as combined sewer collection and which portions are designated as separate sanitary collection.

11. In Attachment 4 of ECSD's Section 308 Information Request response dated August 1, 2013, ECSD identified locations where overflow events occurred from 2008 to 2012. For each of these identified overflow events, identify the portion of the collection system in which each overflow event occurred (i.e. whether it occurred within the combined sewer collection system or the separate sanitary collection system).

12. Identify any and all Unauthorized CSO Discharge events and/or Backups that occurred within ECSD's Combined Sewer System from 2008 to the present and provide the following information for each event (create a supplementary table as necessary to list the data below):
    a. Date of the Unauthorized CSO/Backup;
    b. Location of the Unauthorized CSO/Backup;
    c. Estimated volume of Unauthorized CSO/Backup;
    d. Reason that the Unauthorized CSO/Backup occurred;
    e. How the Unauthorized CSO/Backup occurrence was determined;
    f. Precipitation contribution to Unauthorized CSO Backup (inches);
    g. WWTP Peak flow on day of Unauthorized CSO/Backup (MGD);
    h. Disposition of Unauthorized CSO/Backup (waterway, storm sewer, pavement, other);
    i. Mitigating action taken to address Unauthorized CSO/Backup;
    j. Unauthorized CSO/Backup reported to IDEM (y/n)
    k. Unauthorized CSO/Backup reporting time frame (hrs); and
    l. Results if Unauthorized CSO/Backup samples were taken and/or analyzed.

    Continue to submit this information to EPA on a monthly basis until directed by EPA to discontinue submittals.

13. Describe any and all SSO events that have occurred in the Separate Sanitary Sewer System from January 2013 to the present. Include the following information for each SSO (create a supplementary table as necessary to list the data below):
    a. Date of SSO;
    b. Location of SSO;
    c. Estimated SSO volume (gallons);
    d. Reported cause of SSO;
    e. How SSO occurrence was determined;
    f. Precipitation contributing to SSO (inches);
    g. WWTP peak flow on day of SSO (MGD);
    h. Disposition of SSO (waterway, storm sewer, pavement, or identify other);
    i. Mitigating action taken to address SSO;
    j. SSO reported to IDEM (yes/no);
    k. SSO reporting time frame (hrs); and
    l. If SSO samples were taken and/or analyzed.

Continue to submit this information to EPA on a monthly basis until directed by EPA to discontinue submittals.

14. Provide a copy of the most recent Infiltration and Inflow report, which is referenced in ECSD's response to Paragraph 36c. of the August 2013 308 Response.

15. Provide CSO Discharge Monitoring Reports from January 2013 to the present. Continue to submit this information to EPA on a monthly basis until directed by EPA to discontinue submittals.

Water Quality Monitoring

16. ECSD shall conduct Water Quality Monitoring (Monitoring) in both the Grand Calumet River (GCR) and the Indiana Harbor Ship Canal (IHSC) as detailed below.
    a. Monitoring shall be conducted for the entire Monitoring Period and shall commence no later than 7 Days following EPA approval of the Quality Assurance Project Plan (QAPP) (discussed in Paragraph 17).
    b. All Monitoring conducted pursuant to this Information Request shall be collected, handled, and analyzed in accordance with 40 C.F.R. Part 136.
    c. Two types of monitoring shall be performed: Fixed Day Monitoring and Wet Weather Monitoring as described in this Information Request.
    d. Samples and measurements taken as required below shall be representative of the volume and nature of the monitored discharge flow and shall be taken at times that reflect the full range and concentration of required parameters. Samples shall not be taken at time to avoid showing elevated levels of any parameters.

Quality Assurance Project Plan

17. By July 1, 2014, ECSD shall prepare and submit to EPA for approval a Quality Assurance Project Plan (QAPP). The QAPP shall include timelines for all Monitoring elements and shall follow EPA Guidance for Quality Assurance Project Plans, EPA QA/G-5, EPA 240-R-02-009 (Dec. 2002). ECSD shall not conduct Water Quality Monitoring in response to this letter until EPA has approved the QAPP.

18. The QAPP shall include complete descriptions of the following Monitoring elements, as identified in Paragraphs 16-28 of this Information Request:
    a. Rain gauges;
    b. Locations and dates during which ECSD anticipate conducting Fixed Day Monitoring;
    c. Methodology for carrying out Fixed Day Monitoring;
    d. Methodology for carrying out Wet Weather Monitoring; and
    e. Characteristics of the storm events during which ECSD anticipates conducting Wet Weather Monitoring.

Rain Gauges

19. ECSD shall identify any and all locations of existing operating rain gauges.

20. If rain gauges do not currently exist as described in this Paragraph, ECSD shall establish and operate a network of automatic rain gauges capable of recording 15 minute rainfall to the nearest 0.01 inches for the requested Monitoring. The number and placement of gauges shall be adequate to characterize precipitation across the ECSD service area. ECSD shall install and/or operate one rain gauge per two square kilometers, with a minimum of three rain gauges, all of which are to be appropriately distributed. The gauges can be real, or can be a combination of real and virtual (radar based) gauges with at least two real gauges. ECSD shall operate the gauges, collect the data generated by these gauges, and validate said data for the entire Monitoring Period.

21. The QAPP shall identify existing rain gauges and ECSD's plan for any additional rain gauges to be installed and operated in order to meet the requirements of the rain gauges described in Paragraph 20. If ECSD does not plan to install and operate additional rain gauges as described in Paragraph 20, the QAPP shall clearly describe how ECSD believes the existing rain gauges meet the above requirements.

Fixed Day Monitoring

22. ECSD shall conduct In-Stream Monitoring at set locations following a fixed schedule for the duration of the Monitoring Period (Fixed Day Monitoring).
    a. Fixed Day Monitoring shall take place on five or more predetermined evenly-spaced days per month at locations identified by ECSD as described below:
        i. At least one Fixed Day Monitoring location per Receiving Water (i.e. at least one for GCR and one for IHSC);
        ii. Locations shall be representative of the water quality immediately upstream of each specific CSO outfall that is being sampled; and
        iii. Locations shall be representative of water quality immediately downstream of each specific CSO outfall (but upstream of any subsequent CSO outfalls) that is being sampled.
    b. In the QAPP requested in Paragraph 17, ECSD shall clearly describe how and why each identified location was chosen for Fixed Day Monitoring.

23. Fixed Day Monitoring shall consist of:
    a. Single grab samples will be collected at each location and analyzed for the following parameters:
        i. Escherichia coli (*E. coli*);
        ii. Phosphorus, total;
        iii. BOD, 5 day;
        iv. Total Suspended Solids;
        v. Ammonia;
        vi. Arsenic;
        vii. Cadmium;

viii. Residual Chlorine;
ix. Chromium, total;
x. Copper;
xi. Cyanide, free;
xii. Fluoranthene;
xiii. Fluoride;
xiv. Iron, dissolved;
xv. Lead;
xvi. Mercury;
xvii. Molybdenum;
xviii. Nickel;
xix. bis(2-ethylhexyl) Phthalate;
xx. Phenols;
xxi. Silver;
xxii. Sulfate;
xxiii. Thallium; and
xxiv. Zinc.

b. A 24-hour composite sample for metals taken once per hour at the Fixed Day Monitoring locations and at the WWTP headworks influent.
c. In situ field measurements taken at mid-depth at each location for the following parameters: dissolved oxygen (DO), temperature, and conductivity.

24. ECSD shall provide EPA with each month's validated Fixed Day Monitoring results within 60 days after the end of the month. The results shall include at least: the Receiving Water name, the locations of each sample, the results of all parameters analyzed, the time and date of each sample taken, the depth from which each sample was taken, and the total depth of the river at the sample location.

Wet Weather Monitoring

25. ECSD shall conduct In-Stream Monitoring at the following locations during three wet weather events, depending on predicted storm characteristics (Wet Weather Monitoring):
    a. All of the Fixed Day Monitoring locations identified under Paragraph 22a., above.
        i. Wet Weather Monitoring at all of the Fixed Day Monitoring locations shall be carried out during storms that are expected to result in the activation of at least one of the CSO Outfalls 002, 003, and 005.
        ii. Wet Weather samples shall be collected concurrently with the CSO sampling described below. ECSD shall collect one sample at each Fixed-Day Monitoring location within one hour after the time that the specific CSO outfall is being sampled and at a time when effluent discharged from the specific CSO outfall being sampled would be expected to have reached the downstream sample location.
    b. Each of the CSO Outfall locations (CSOs 002, 003, and 005).
        i. The CSOs shall be sampled at the CSO outfall locations or a manhole on the CSO piping system, such that the samples taken are representative of discharges from the CSO outfall into the waterbody.

ii. In the QAPP requested in Paragraph 17, ECSD shall clearly describe how and why each identified location was chosen for CSO Outfall Wet Weather Monitoring.

iii. ECSD shall conduct sampling at each CSO Outfall at least once every four times that the specific CSO discharges. In other words, ECSD shall sample one of every four discharge events from each specific CSO outfall. After the first four discharge events, ECSD shall implement another round of the CSO sampling, so that each CSO outfall identified in the NPDES permit is sampled at least a second time during the next four discharge events. ECSD shall continue to sample in this manner during the Monitoring Period, or earlier if EPA notifies ECSD in writing that ECSD can cease sampling the CSOs, before the end of the Monitoring Period.

iv. At each CSO outfall sampled, ECSD shall obtain at least one grab sample of the effluent discharged during the first 30 minutes of the CSO discharge.

26. Wet Weather Monitoring shall consist of:

a. Single grab samples will be collected at each location and analyzed for the following parameters as follows (in hours since storm event beginning): 0 – 3, 6, 18, 24, 48, 72 (for hours 6 – 72, +/- 1.5 hours):

i. Escherichia coli (*E. coli*);
ii. Phosphorus, total;
iii. BOD, 5 day;
iv. Total Suspended Solids;
v. Ammonia;
vi. Arsenic;
vii. Cadmium;
viii. Residual Chlorine;
ix. Chromium, total;
x. Copper;
xi. Cyanide, free;
xii. Fluoranthene;
xiii. Fluoride;
xiv. Iron, dissolved;
xv. Lead;
xvi. Mercury;
xvii. Molybdenum;
xviii. Nickel;
xix. bis(2-ethylhexyl) Phthalate;
xx. Phenols;
xxi. Silver;
xxii. Sulfate;
xxiii. Thallium; and
xxiv. Zinc.

b. In situ field measurements will be taken at mid-depth at each location for the following parameters: DO, temperature, and conductivity.

27. ECSD shall collect one sample for a Whole Effluent Toxicity (WET) test from each of the CSO outfalls in the following manner:
    a. The WET test shall be an Acute Toxicity Test. This is a static renewal test conducted on an exponentially diluted series of effluent. The purpose is to calculate the proportion of effluent that causes 50 percent mortality/immobility of aquatic organisms at 48 or 96 hours. An LC50/EC50 (lethal/immobile concentration) less than or equal to 100 percent effluent constitutes a positive for toxicity.
    b. Testing shall be conducted in accordance with procedures outlined in EPA-821-R-02-012 "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms."
    c. Test organisms for each test shall include the fathead minnow (*Pimephales promelas*) – Method 2001.0, and *Ceriodaphnia dubia* – Method 2002.0.
    d. Static renewal acute serial dilution test of the effluent shall consist of a control, 12, 25, 50, 75 and 100 percent effluent.
    e. Demonstration of acute and chronic toxicity shall have the definitions as stated in ECSD's NPDES Permit Section D.1.f.(1): "acute toxicity will be demonstrated if the effluent is observed to have exceeded 1.0 TU_a (acute toxic units) based on 100% effluent for the test organism in 48 and 96 hours for *Ceriodaphnia dubia* or *Pimephales promelas*, whichever is more sensitive."
    f. ECSD shall conduct sampling at each CSO outfall at least once every calendar year. ECSD shall continue to sample in this manner until the end of the Monitoring Period, or earlier if EPA notifies ECSD in writing that ECSD may cease sampling the CSOs before the end of the Monitoring Period.
    g. At each CSO outfall sampled, ECSD shall obtain at least one grab sample of the effluent discharged during the first 30 minutes of the CSO discharge.

28. ECSD shall provide EPA with each Wet Weather Monitoring event's validated Monitoring results 60 days following completion of each Wet Weather Monitoring event. The results shall include at least: Receiving Water name, locations of each sample, time and date of each sample taken, depth from which each sample was taken, total depth of the river at the sample location, raw rain gauge data, summary of rainfall per storm event for each gauge, results of all parameters analyzed, CSO Discharge data for all CSO Outfalls, and the river flow data during the Wet Weather Monitoring event.

Pretreatment

Within 30 days of receipt of this Information Request, unless otherwise indicated, ECSD shall:

29. Within 60 days of receipt of this Information Request, initiate an industrial waste survey, and identify Industrial Users that meet the criteria per 40 C.F.R. § 403.3(v).
    a. On or before October 1, 2014, ECSD shall submit to EPA a complete list of all industrial users (IUs), including non-significant industrial users, non-categorical significant industrial users, and categorical industrial users. The list shall include:
        i. The identity of the industrial user including name, address, and facility contact information;
        ii. A full description of the facility's industrial processes; and

iii. A clear explanation of how ECSD determined the classification of each identified IU.

30. Within 60 days of receipt of this Information Request, initiate a local limit evaluation, following the EPA Local Limits Development Guidance EPA 833-R-04-002A.
    a. On or before October 1, 2014, ECSD shall submit the evaluation for EPA approval. ECSD must continue to correspond with EPA until EPA approves its local limits.

31. Submit to EPA a summary of all self-monitoring data collected from IUs from January 2010 to the present. Continue to submit this information on a monthly basis.

32. Submit to EPA a summary of ECSD enforcement activities from January 2013 to the present for each industrial user that violated any pretreatment requirements, that includes but not limited to:
    a. The identity of the industrial user;
    b. The pretreatment requirements violated;
    c. The enforcement actions taken by ECSD;
    d. A clear narrative explanation of how ECSD's enforcement action complies with the required action under ECSD's enforcement response plan;
    e. Identification of all instances of IU significant noncompliance (SNC) with pretreatment requirements as defined at 40 C.F.R. § 403.8(f)(2)(viii). Provide a clear description of the violation(s) and the evidence, and an explanation of how ECSD determined that each IU's noncompliance meets the SNC threshold; and
    f. A copy of any and all public notices issued for those IUs identified in Paragraph 31e. per 40 C.F.R. § 403.8(f)(2)(viii).

    Continue to submit this information to EPA on an annual basis until directed by EPA to stop or until ECSD has filed the annual summary for January-December 2017.

V. SUBMITTALS

1. Submit your response to this Information Request within the time-frames described above to:

    Water Enforcement and Compliance Assurance Branch (WC-15J)
    U.S. Environmental Protection Agency, Region 5
    77 West Jackson Boulevard
    Chicago, Illinois 60604-3590
    Attention: Michelle Heger

2. You must submit all requested information under an authorized signature with the following certification:

    I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my

inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

3. If you find at any time after submitting information to EPA that any portion of the submittal is false or incorrect, you must notify EPA immediately. Knowing submittal of false information to EPA in response to this Information Request may subject you to criminal prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), and 18 U.S.C. §§ 1001 and 1341.

4. You may not withhold information because you claim it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Information Request, as provided in 40 C.F.R. § 2.302(a)(2). The regulations provide that a person may assert a business confidentiality claim covering part or all of the information furnished to EPA when that person submits the information. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Effluent data (as defined in 40 C.F.R. § 2.302(A)(2)) and information in NPDES permit applications is not entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If you do not assert a claim of business confidentiality when you submit the information, EPA may make the information available to the public without further notice.

5. This Information Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

6. EPA may use the information submitted in response to this Information Request in an administrative, civil or criminal action.

7. Neither the issuance of this Information Request by EPA nor your compliance with this Information Request relieves you of liability for any penalty, fine, remedy or sanction authorized to be imposed pursuant to Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g), including but not limited to those related to any violations addressed by this Information Request. EPA specifically reserves the right to seek any of the remedies specified in Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g).

8. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Section 308(a) of the CWA, 33 U.S.C. § 1318(a).

9. A Submittal and Compliance Schedule Summary has been included as Attachment B to this document for generally informative purposes only. ECSD shall refer to the entirety of the Information Request for complete timeframes and requests.

10. If you have any questions about this Information Request, contact Michelle Heger of my staff by telephone at (312) 886-4510, or via email at heger.michelle@epa.gov.

Tinka G. Hyde

Tinka G. Hyde
Director, Water Division
U.S. Environmental Protection Agency, Region 5

5/29/14
Date

CSO Checklist

NOTE: Use additional sheets as needed.

CHECK THE APPROPRIATE BOX (Y - Yes, N - No)	Y	N	N/A	RESPONSE
CSO IDENTIFICATION				
1. Identify the total number of each CSO, SSO, and Bypass location.				
2. For any CSO, SSO, and Bypass locations not identified in NPDES Permit No. IN0022829, identify each (if applicable) by its location (latitude and longitude), identification number, street address, and receiving stream.				
3. Does ECSD have maps and/or schematics of the sewer system depicting Combined Sewer System (CSS) areas and Sanitary Sewer System (SSS) areas including CSO, bypass and SSO locations and receiving stream(s)? If yes, provide copies of these maps.				
DRY WEATHER OVERFLOWS (DWOs)				
4. Does ECSD check CSO locations during dry weather? If yes, at what frequency or schedule?				
5. If Dry Weather Overflows (DWO) are identified, does ECSD notify the NPDES regulatory authority?				

If yes, in what manner (i.e. verbal and/or written) and within what timeframe?				
6. Does ECSD have a corrective action plan to eliminate DWOs? If yes, provide a copy of the plan and describe it including defined tasks and schedules.				
SYSTEM DESCRIPTION				
7. Does ECSD have an inventory of the whole sewer system (e.g. sewer system map)? If yes, provide a copy of this inventory and/or map which identifies the following. If the inventory does not contain one of the following items, explain and/or provide alternative documentation.				
a. All combined sewers and all sanitary sewers tributary to the combined sewers				
b. All storm sewers connected to combined sewers				
c. All major interceptors and trunk sewers				
d. All sewer sizes, slopes and materials				
e. All manholes and catch basins				
f. All CSOs, SSOs, treatment plant bypasses, and outfalls and each receiving stream(s)				

g. All control structures (regulators, diversion structures, weirs, valves, etc.)				
h. All pump and lift stations and respective capacities				
i. All locations for sampling, monitoring, sensors, and telemetering devices				
j. All CSO treatment facilities including unit processes and capacities				
k. All outfalls to environmentally sensitive areas				
8. What is the capacity of each interceptor?				
9. What is the wet weather WWTP treatment capacity? Include peak hydraulic flow, peak sustained treatable flow, and average design flow.				
10. Are portions of the interceptors or other lines adequately sized relative to the WWTP capacity? If not, identify undersized interceptors.				
11. What is the wet weather treatment capacity of the WWTP?				
12. Is the capacity of the WWTP is utilized before CSOs occur? Describe how.				
13. Are all lift stations operating as designed? If not, explain.				
14. Are mechanisms in place to ensure the continuous operation of the pumps at the lift stations? If not, explain.				

15. Is standby power available for regulators and CSO controls? Identify what the standby power is and where standby power is and is not available.				
OPERATION & MAINTENANCE				
16. Has ECSD developed a Combined Sewer Operational Plan (OP) or a CSS O&M manual?				
17. Has the OP been approved by the State or U.S. EPA? If yes, when? Provide the approval documentation (i.e. letter, email, etc.).				
18. Does ECSD implement the OP? Is implementation documented? If yes, where or how?				
19. Does ECSD conduct regular inspections of the sewer system? If yes, what is the inspection method and frequency/schedule for the following:				
a. CSO (and SSO) outfalls structures				
b. Regulator and diversion structures				
c. Pump/lift stations				
d. Sewers (e.g. televise)				
e. Surface water anti-intrusion devices (e.g. flapgates, etc.)				

20. Is the maintenance program effective in reducing sewer line and lift station problems? Provide examples of instances where ECSD observes the program operating both effectively and not effectively, as applicable.					
21. What timeframe is followed to repair or replace malfunctioning equipment? Where are repairs and replacements documented? Provide an example and document which contains dates.					
22. Does ECSD check for and eliminate illegal connections? If yes, describe method and frequency.					
23. Does ECSD operate CSO control facilities during both dry and wet weather? If not, which ones and why not?					
24. Does ECSD have schedules for routine maintenance such as catch basin cleaning and cleaning of trunk and interceptor sewers? If yes, what is this schedule? Where is it documented?					

25. Does ECSD have schedules for pollution prevention measures such as: regular street cleaning in combined sewer areas with added emphasis on leaf removal, industrial flow control, drainage area marking, etc.? If yes, what is this schedule? Where is it documented?				
26. Are the stop planks, weirs, etc. set at the highest level practical without causing basement backups or excessive street flooding? Explain.				
27. Does ECSD have procedures for the following? Provide the document which describes the method, or if no written document exists, state document does not exist and describe each.				
a. Cleaning screening equipment after, and if necessary, during each storm				
b. Regulating diversion and bypass valves				
c. Reducing solids deposition in the CSS				
28. Can the overall condition of the entire sewer collection system and CSO be described as good as a result of proper O&M? Explain why or why not.				

29. Are inspections documented? If so, how? Provide examples of inspection documentation.				
30. Do inspection documents include the following:				
a. Results of various types of inspections				
b. Dates and times				
c. Corrective action taken if problems found				
31. Does ECSD maintain a log book of maintenance and repair on the sewer system and CSO structures maintained? If so, does the log book contain:				
a. Identification of type of problems like collapsed and blocked sewers, basement backups, street flooding (or indicate routine maintenance),				
b. Repair made (or maintenance activity conducted), and				
c. Time and date?				
RECORDS				
32. Has the maintenance program been effective in reducing or eliminating recurring sewer line or lift station problems as indicated in maintenance records? Provide examples.				
33. Does ECSD maintain flow records for each lift station?				

34. Does ECSD maintain the following records for each CSO location:				
a. Discharge frequency				
b. Flow magnitude (volume)				
c. Pollutant characterization				
d. Correlation with rainfall records				
e. Specific causes of overflows				
f. Flow collected/flow diverted				
g. Flow records of overflows and flow records of receiving streams				
35. Does ECSD maintain records of collapsed and blocked sewers?				
36. Does ECSD maintain records of CSO control facilities (e.g., excess flow retention basin levels)?				
37. Does ECSD maintain records on DWOs, SSOs and/or plant bypasses? Are they also reported on the MORs and/or DMRs?				
COMPLIANCE SCHEDULES				
38. Is ECSD meeting the terms and conditions of a compliance schedule as a result of an enforcement action, to correct sewers, CSOs, SSOs, DWOs, and/or bypassing? Describe.				
39. Is ECSD meeting the compliance schedules established in the CSO Section of the NPDES Permit?				

40. Does a permit or enforcement agreement require implementation of each of the nine minimum controls?				
41. Has ECSD submitted documentation of the implementation of the nine minimum controls? To whom?				
42. Has ECSD developed (or is it developing) a Long Term Control Plan (LTCP)? Specify which. Provide a copy of the plan.				
43. Has the LTCP been approved by IDEM or EPA? Provide the documentation of approval.				
44. Is ECSD implementing the LTCP? Identify the stage of the LTCP at which ECSD is currently operating.				

Section 308 Information Request
Submittal and Compliance Schedule Summary

Note: The following table is meant to be generally informative only. Refer to full 308 Information Request document for exact timeframes and activities to be completed.

Timeframe	Activity	Paragraph Reference in Information Request
7 days following receipt of Request	1. Notify EPA, in writing, of intention to comply with Request	II. 3.
	General Information	
30 days following receipt of Request	1. Submit General Information Requests #1-15	1-15
Monthly, until directed by EPA to discontinue	2. Continue to submit General Requests #12, 13, and 15	12, 13, 15
	Water Quality Monitoring	
On or before **July 1, 2014**	1. Prepare and submit QAPP for EPA approval	17
7 Days following EPA approval of QAPP	2. Begin Monitoring	16a.
60 days after the end of a month of monitoring	3. Submit validated Fixed Day Monitoring and Wet Weather Monitoring results	24, 28
	Pretreatment	
30 days following receipt of Request	1. Submit information requests #31 and 32	31, 32
Within **60** days following receipt of Request	2. Initiate industrial waste survey	29
	3. Initiate local limit evaluation	30
On or before **October 1, 2014**	4. Submit results of industrial waste survey to EPA	29a
	5. Submit results of local limit evaluation to EPA	30a
Monthly, until directed by EPA to discontinue	6. Continue to submit self monitoring data collected from IUs	31
Annually, until directed by EPA to discontinue or through Jan-Dec 2017 submittal	7. Continue to submit ECSD enforcement activities	32